

217/782-2113

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

T&D Metal Products, LLC
Attn: Roger Dittrich
601 East Walnut Street
Watseka, Illinois 60970

Application No.: 03020050

I.D. No.: 075090ABJ

Applicant's Designation:

Date Received: February 20, 2003

Subject: Polyester Gel/Resin Spray Booths

Date Issued:

Expiration Date:

Location: 601 North 4th Street, Watseka

Permit is hereby granted to the above-designated Permittee to OPERATE emission unit(s) and/or air pollution control equipment consisting of gel coat and polyester resin/chopped fiberglass spray booths pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued to limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 10 tons/year for a single hazardous air pollutant (HAP)). As a result, the source is excluded from the requirements to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
- c. This permit supersedes all operating permits for this location.
2. Operation and emissions of polyester parts manufacturing plant shall not exceed the following limits:

<u>Raw Material</u>	E M I S S I O N S					
	Material Usage		VOM*		Styrene	
	(ton/mo)	(ton/yr)	(lb/mo)	(ton/yr)	(lb/mo)	(ton/yr)
Gel Coat	1.5	12.0	881	3.5	722	2.9
Resin	3.0	24.0	1,341	6.0	891	3.6

* - VOM emissions include styrene emission

These limits are based on the maximum production rate, emission factors for styrene emission found in Technical Discussion of the Unified Emission Factors for Open Molding of Composites (April 7, 1999) and the following physical properties of raw materials:

gel coating: volatile organic materials (VOM) content - 47.6% (including 42.3% of styrene), emission factors for styrene - 481 lb/ton of gel coat used and 100% for non-styrene VOM;
resin: VOM content - 56% (including 46% of styrene), emission factors for styrene - 297 lb/ton of resin used and 100% for non-styrene VOM; Compliance with annual limits shall be determined from a running total of 12 months of data.

3. This permit is issued based on negligible emissions of volatile organic materials from the clean-up and other non-molding activities at the plant. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 ton/year.
4. The emissions of HAPs as listed in Section 112(b) of the Clean Air Act shall not equal or exceed 10 tons per year of any single HAP or 25 tons per year of any combination of such HAPs, or such lesser quantity as USEPA may establish by rule which would require the Permittee to obtain a CAAPP permit from the Illinois EPA. As a result of this condition, this permit is issued based on the emissions of any HAP from this source not triggering the requirement to obtain a CAAPP permit from the Illinois EPA.
5. The Permittee shall maintain monthly records of the following items:
 - a. Names and amounts of raw materials used (Tons/Mo, Tons/Yr);
 - b. VOM and styrene content of raw materials (wt %); and
 - c. VOM and styrene emission calculations (Lbs/Mo, Tons/Yr).
6. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least three years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA request for records during the course of a source inspection.
7. If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedances or violation and efforts to reduce emissions and future occurrences.
8. The Permittee shall submit the names and amounts of gels and resins used and their VOM and styrene content from the prior calendar year, along with the Annual Emissions Report, due May 1st of each year.

9. Two (2) copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, IL 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control - Regional Office
2009 Mall Street
Collinsville, Illinois 62234

If you have any questions on this permit, please call Valeriy Brodsky at 217/782-2113.

Donald E. Sutton, P.E.
Manager of Permit Section
Division of Air Pollution Control

DES:VJB:

cc: Illinois EPA, FOS Region 3
Illinois EPA, Compliance Section
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emission from the Polyester Resin Product Manufacturing Plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. This is a usage of 12 tons of gel and 24 tons of polystyrene resins per year. The resulting maximum emissions are well below the levels, e.g., 10 tons per year for a single HAP, at which this source would be considered a major source for purposes of the Clean Air Act Permit Program. Actual emissions from this source will be less than predicted in this summary to the extent that material is handled, and control measures are more effective than required in this permit.

1. Operation and emissions of polyester parts manufacturing plant shall not exceed the following limits:

<u>Raw Material</u>	E M I S S I O N S					
	Material Usage		VOM*		Styrene	
	<u>(ton/mo)</u>	<u>(ton/yr)</u>	<u>(lb/mo)</u>	<u>(ton/yr)</u>	<u>(lb/mo)</u>	<u>(ton/yr)</u>
Gel Coat	1.5	12.0	880	3.5	720	2.9
Resin	3.0	24.0	1,340	6.0	890	3.6

* - VOM emissions include styrene emission

These limits are based on the maximum production rate, emission factors for styrene emission found in Technical Discussion of the Unified Emission Factors for Open Molding of Composites (April 7, 1999) and the following physical properties of raw materials:

gel coating: volatile organic materials (VOM) content - 47.6% (including 42.3% of styrene), emission factors for styrene - 481 lb/ton of gel coat used and 100% for non-styrene VOM;

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VJB: